

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ELLIOT GONZALEZ REYES

Debtor(s)

CASE NUMBER: 11-04536

CHAPTER 13 (ASSET CASE)

**MOTION REQUESTING THE CONTINUANCE OF THE AUTOMATIC STAY**

**TO THE HONORABLE COURT:**

COMES now Debtor(s) represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

1. The Debtor moves the court to enter an order for continuance of the automatic stay provided under s 362 (a). In support of this motion, the Debtor states as follows:

2. Debtor has one prior bankruptcy within one year from the filing of the instant case and respectfully request the stay be continued in regards with his creditors based on the following circumstances:

a) He couldn't make the payments due to the fact his finances changed. Debtor believes his income is back to normal and he will be able to comply with the payment schedule plan.

b) Debtor is fully aware that the bankruptcy is a privilege and he needs a chance to provide he can reorganize his finance by completing with his payment schedule plan, this in order to retain his vehicle which is his only means of transportation.

**WHEREFORE,** the Debtor respectfully requested from this Honorable Court to continue the automatic stay under Section 362(a) as to all Creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under s 362(c)(1) or (c)(2) or a motion for relief is granted under s 362(d).

**NOTICE:** "Parties in interest are hereby granted eleven (11) days from the date of this notice to request hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon the filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed the Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejections should be denied."

In San Juan, Puerto Rico, this 31<sup>st</sup>, day of May 2011.

**RESPECTFULLY SUBMITTED.**

*/s/Marilyn Valdes Ortega*  
**MARILYN VALDES ORTEGA**  
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San Juan, PR 00919-5596  
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E-mail valdeslaw@prtc.net

**I HEREBY CERTIFY:** That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

**11-04536-13 Notice will be electronically mailed to:**

JOSE RAMON CARRION MORALES  
newecfmail@ch13-pr.com

MONSITA LECAROS ARRIBAS  
ustpreion21.hr.ecf@usdoj.gov

MARILYN VALDES ORTEGA on behalf of Debtor  
valdeslaw@prtc.net

**I HEREBY CERTIFY:** That I have mailed by regular mail to all creditors listed.

**11-04536-13 Notice will not be electronically mailed to:**

ADVANCE COLLECTION SERVICES,  
INC.  
PO BOX 71515  
SAN JUAN, PR 00936-8615

CENTENIAL DE PUERTO RICO  
PO BOX 71514  
SAN JUAN, PR 00936

CINGULAR WIRELESS  
P.O. BOX 192830  
SAN JUAN, PR 00919-5369

DEPARTAMENTO DE HACIENDA  
PO BOX 9024140  
OFICINA 424 B  
SAN JUAN, PR 00902

DEPARTAMENTO DEL TRABAJO  
AVE. MUÑOZ RIVERA 505  
HATO REY, PR 00918

FEDERAL LITIGATION DEPT OF  
JUSTICE  
PO BOX 9020192  
SAN JUAN, PR 00902-0192

HOSPITAL GENERAL MENONITA  
CAYEY DEPTO. DE COBROS X5873  
PO BOX 373130  
CAYEY, PR 00737

INTERNAL REVENUE SERVICE  
PO BOX 7346  
PHILADELPHIA, PA 19101-7346

NCO FINANCIAL SYSTEMS OF PR,  
INC.  
PO BOX 192478  
HATO REY, PR 00918

PR TELEPHONE CO  
PO BOX 360998  
SAN JUAN, PR 00936-0998

TOYOTA FINANCIAL SERVICES  
PO BOX 71410  
SAN JUAN, PR 00936-8510

TRANSWORLD SYSTEMS INC.  
PO BOX 1864  
SANTA ROSA, CA 95402

WESTERNBANK  
PO BOX 1180  
MAYAGUEZ, PR 00681-1180